

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE: §
§ CASE NO.: 24-70089-SWE11
HIGH PLAINS RADIO NETWORK, LLC, §
§
DEBTOR. §

**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE OF NOTICES AND OTHER DOCUMENTS**

PLEASE TAKE NOTICE that Frank J. Wright and Jeffery M. Veteto with the Law Offices of Frank J. Wright, PLLC hereby enter their appearances as counsel of record in the above-styled and numbered case for Dan C. Guthrie, Jr. ("**Guthrie**"), an interested party in the Debtor's sale process. The undersigned attorneys and law firm hereby enter their appearance pursuant to Title 11 U.S.C. §1109(b) and Bankruptcy Rules 9010(b) and Rules 9010(b) and request copies of all notices and pleadings pursuant to Bankruptcy Rules 2002(a), (b) and (f) and 3017(a). All such notices should be addressed as follows:

Frank. J. Wright
Jeffery M. Veteto
LAW OFFICES OF FRANK J. WRIGHT, PLLC
1800 Valley View Lane, Suite 250
Farmers Branch, Texas 75234
Telephone: (214) 935-9100
Emails: frank@fjwright.law; jeff@fjwright.law

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes notices and papers referred to in the Rules specified above but also includes, without limitation, notices of any application, complaint, demand, hearing, motion, order, petition, plan of reorganization or disclosure statement, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex or fax or otherwise, filed with regard to the above cases and proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim, or suit shall waive any right (1) to have final orders in non-core matters entered only after de novo review by a District Judge, (2) to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, or (3) to have the District Court withdraw the reference to any matter subject to mandatory or discretionary withdrawal.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Service of Notices and Other Documents is without prejudice to (1) Guthrie's rights, remedies, claims, actions, defenses, setoffs or recoupment, in law or in equity, against the Debtor and any other entities either in these cases or in any other action, all of which rights, remedies, claims, actions, defenses, setoffs and recoupments are expressly reserved, and (2) any objection which may be made to the jurisdiction of the Court, and shall not be deemed or construed to submit Guthrie to the jurisdiction of the court.

The undersigned additionally request that the Debtor and the Clerk of the court place the foregoing name and address on any mailing matrix or list of creditors to be prepared in existing in the above-numbered cases.

DATED: January 30, 2025

LAW OFFICES OF FRANK J. WRIGHT, PLLC

By: /s/ Frank J. Wright
Frank J. Wright
State Bar No. 22028800
Jeffery M. Veteto
State Bar No. 24098548

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COUNSEL FOR DAN C. GUTHRIE, JR.

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the 30th day of January 2025, a true and correct copy of the foregoing document was served upon those parties registered to receive electronic notice *via* the Court's *CM/ECF system* for the Northern District Texas.

/s/ Jeffery M. Veteto
Jeffery M. Veteto